

September 29, 2020

VIA ECF

The Honorable Gabriel W. Gorenstein
 United States Magistrate Judge
 Southern District of New York
 500 Pearl Street, Courtroom 6B
 New York, NY 10007

Re: *Ulku Rowe v. Google LLC*, Case No. 1:19-cv-08655 (LGS)(GWG)

Dear Judge Gorenstein:

Following Your Honor's August 28, 2020 Order in the above-referenced matter (Dkt. No 56), the parties have met and conferred in an attempt to resolve their disputes regarding discovery. We are pleased to report that we have reached compromise with respect to the issues raised in the parties' letters dated August 18, 2020 (Dkt. 52) and August 21, 2020 (Dkt. 55).

To accommodate the efforts undertaken and additional discovery exchanged to resolve those disputes, the parties are respectfully requesting additional time to complete discovery remaining in this case. Plaintiff has noticed ten depositions, including a 30(b)(6) deposition for which Defendant has identified three witnesses. Defendant has noticed Plaintiff's deposition. The parties are in the process of finalizing dates for all witnesses, but so far depositions are currently scheduled for October 2, October 9, October 14, October 15, October 23, October 27, October 29, and November 10.

Accordingly, the parties therefore jointly request the following extension to the discovery schedule in this matter, revising Your Honor's amendments to the Scheduling Order reflected in Dkt No. 51, as follows:

Description	Current Deadline	Proposed Deadline
Completion of depositions pursuant to Fed. R. Civ. P. 33	September 21, 2020	December 4, 2020
Service of requests to admit pursuant to Fed. R. Civ. P. 36	October 16, 2020	December 11, 2020
Deadline to meet and confer regarding a schedule for expert disclosures	August 21, 2020 ¹	October 13, 2020
Completion of all expert discovery	October 22, 2020	December 18, 2020
Date of pre-motion conference before Hon. Lorna G. Schofield	November 12, 2020 at 10:40 a.m.	December 17, 2020 or at the Court's convenience

¹ The parties met and conferred prior to this date and determined to resume meet and confer discussions on this topic after reaching resolution of open discovery disputes, either by court order or agreement between the parties. See Dkt. 54 at p. 4.

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This is the third request to extend discovery deadlines in this matter.

The parties thank the Court for its consideration of this matter.

Respectfully submitted,



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